eeg enterprises, inc.

1 rome street • farmingdale, n.y. 11735 • 516-293-7472

April 4, 1997

Office of the Secretary
1919 M Street, N.W.
Federal Communications Commission
Washington, DC 20554

Re: CS Docket No. 97-55

Dear Sir,

Enclosed are the original and eleven copies of EEG Enterprises, Inc.'s comments on the request for comments on the proposed system for Rating Video Proramming.

Very truly yours,

EEG Enterprises, Inc.

William Posner
President

WP/mmp

No. of Copies rec'd 0+10
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Industry Proposal For Rating Video Programming	)	CS Docket No. 97-55, FCC 97-34
	)	
	)	

To the Commission.

COMMENTS OF EEG ENTERPRISES, INC.

I. INTRODUCTION

EEG ENTERPRISES, INC. ("EEG") hereby responds to the Commission's request for comments on the referenced docket.

EEG is a member of the Consumer Electronics Manufacturers Association ("CEMA") of the Electronics Industries Association ("EIA") and a member of the National Association of Broadcasters ("NAB"). EEG is an active member of the CEMA Television Data Systems Subcommittee, R4.3. and has participated in the deliberations of several of the Subcommittee working groups.

EEG has been involved in the Line 21 Closed Captioning system since 1979. We have been continuously participating in the system development and equipment manufacture for the Line 21 system since that time.

II TECHNICAL CONSIDERATIONS

Through our participation in the R4.3 working group activities, EEG's focus has been centered on the technical aspects of the transmission and reception of closed captioning and extended data services. With regard to rating video programming, we have concentrated on devising and evaluating the means of transporting the required information from the source to the end user and with ways of implementing a user friendly receiver solution.

The Program Rating packet of the Extended Data Services ("XDS") of Line 21 Field 2 has been recommended as the vehicle for delivering the rating codes. EEG has performed theoretical analyses on the latency associated with the transmission and reception of this packet and found that they could be effectively delivered without disrupting associated XDS data services, even in the presence of Field 2 captions. Under the auspices of CEMA and NAB, EEG is currently engaged in laboratory testing of real transmissions in order to substantiate the theoretical results previously derived.

III COMMENTS ON PROPOSED RATING SYSTEM

The technical performance evaluation of the Program Rating packet has included consideration of the data space needed to carry the proposed rating codes. However, it has not required a detailed definition of the data bit assignments for the

rating codes themselves. It is important however, to evaluate certain features of a rating system with regard to its implementability and use. The important characteristics of an effective rating system are deliverability, response time, receiver ease of use and consistency over time.

The deliverability of the Program Rating packet is being tested as noted above. The response time involves the timeliness of the V chip blocking action in the receiver when program ratings change or when switching television channels. The receiver response time is inherently tied in with the transmission protocol. An acceptable response time is a subjective evaluation but present experience indicates satisfactory performance is achievable within the recommended guidelines.

Ease of use involves the ability to implement a cost effective control means within the receiver that the user will find simple to set. V Chip design is best accomplished when the rating system consists of a monotonic rating level structure. The proposed rating system has separated children from the general audience and provided two levels of rating, TV Y and TV Y7, for them. The general audience rating then provides four levels of rating from TV G to TV M.

This rating method results in an inconsistency between the rating of program material for children and for general audiences, which may include children. In a monotonic rating code structure the proposed rating system would result in the following blocking level assignments:

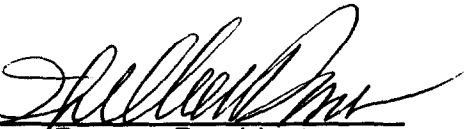
Level 1	TV Y
Level 2	TV Y7
Level 3	TV G
Level 4	TV PG
Level 5	TV 14
Level 6	TV M

When a parent sets the blocking level to level 2 in order to block out children's programs with excessive violence, they would be blocking programming with a rating of TV G or higher as well. Therefore they would be blocking programming well suited for all audiences, including children. We believe that this is not the intended result and changes should be made to eliminate this inconsistency.

It is also important that the rating system must be consistent over time. This does not mean that new rating codes can not be introduced in the future. In fact, we believe that placeholders should be included in the rating table to allow for such future expansion. However, these changes should not alter the meaning and code level response already in use.

Respectfully submitted,

EEG ENTERPRISES, INC.

By 
William Posner, President

1 Rome Street
Farmingdale, New York 11735

Attachment A

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

X Microfilm, microform, certain photographs or videotape.

o Other materials which, for one reason or another, could not be scanned into the RIPS system.

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